

Exhibit D

THE PAYNTER LAW FIRM, PLLC
1200 G STREET ◻ SUITE 800 ◻ WASHINGTON, D.C. ◻ 20005

FIRM RESUME

The Paynter Law Firm, PLLC has extensive experience in complex commercial class action litigation, including federal multi-district litigation. Principal attorney Stuart M. Paynter is an alumnus of Sullivan & Cromwell, where he represented Microsoft in the antitrust suit brought by the Department of Justice and several state attorneys general, as well as in numerous consumer class actions brought in federal and state courts around the country. The Paynter Law Firm concentrates exclusively on plaintiff-side commercial litigation, and currently represents consumers in a growing number of complex commercial class actions around the country.

Representative class action matters include:

- *Pecover v. Electronic Arts*, No. 4:08-cv-02820 (N.D. Cal.). The Paynter Law Firm served as co-class counsel for a certified nationwide class of consumers in an antitrust action against the leading producer of football videogames. The class sought damages and other relief as a result of anticompetitive conduct in the pricing of football videogames, and ultimately reached a \$27 million settlement.
- *Cole v. Wells Fargo N.A.*, No. 06-456453 (San Francisco Super. Ct.). The Paynter Law Firm was appointed co-lead counsel in an action challenging certain marketing campaigns by Well Fargo bank that promised “free gas” in return for listening to an insurance pitch. The case settled successfully in 2010.
- *Keller v. Electronic Arts*, No. 4:09-cv-01967 (N.D. Cal.). The Paynter Law Firm represents a putative class of NCAA student athletes seeking damages and injunctive relief for the use of their likenesses in videogames produced by Electronic Arts.
- *Scranton v. E*TRADE Financial Corp., et al*, No. 1-13-CV-245579 (Santa Clara Super. Court.). The Paynter Law Firm represents a putative nationwide class of consumers harmed by E*TRADE’s misleading representations with respect to the automatic exercise of options held by its customers.

In addition to complex class action litigation, The Paynter Law Firm represents individuals and small companies in high stakes complex commercial disputes. In 2007, The Paynter Law Firm, as co-counsel with a prominent D.C. litigation boutique, achieved a confidential settlement in excess of \$20 million in a trade secrets/intellectual property dispute—approximately double the client’s initial pre-litigation settlement demand. The Paynter Law Firm also currently represents the programmer of the original *Madden Football* videogame in a contract dispute with videogame manufacturer Electronic Arts.